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November 16, 2018

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket 2018-10-E**
 • Duke Energy Carolinas, LLC's 2018 Integrated Resource Plan

Ms. Boyd:

These Comments are provided on behalf of the South Carolina Solar Business Alliance, Inc., ("SCSBA"). I respectfully request that the Commission consider these Comments in the above-referenced Docket.

The SCSBA Position.

The SCSBA respectfully submits this request to this Commission to allow adequate time for a proper independent analysis of Duke Energy Carolinas, LLC's 2018 Integrated Resource Plan, 0("IRP"). The SCSBA is actively coordinating efforts with partner organizations in North Carolina, where Duke Energy Carolinas, LLC's 2018 IRP is under review by the North Carolina Utilities Commission, to retain an Expert Consultant qualified to conduct a comprehensive assessment of Duke Energy Carolinas, LLC's IRP for the Carolinas. This analysis will provide this Commission with valuable information that can, and should be, considered in this Commission's review of Duke Energy Carolinas, LLC's 2018 IRP, as well as in the myriad dockets that directly rely on the assumptions and conclusions made in Duke Energy Carolinas, LLC's IRP.

This Commission's Order No. 2018-429.

As this Commission acknowledged in its recent Order 2018-429:

“Fuel cases and integrated resource planning proceedings continue to evolve due to statutory changes and changes in the electric industry. These proceedings now incorporate more complexity and have the potential for far-reaching consequences.”

Although this Commission's Order No. 2018-429 originated in a proceeding involving South Carolina Electric & Gas, Company, SCSBA believes it appropriately conveys the magnitude of utility IRPs on decisions this Commission will be required to make in pending and future Duke Energy Carolinas, LLC proceedings that directly impact ratepayers and solar businesses in South Carolina. This includes upcoming avoided cost proceedings and current requests for substantial grid related investments by Duke Energy Carolinas, LLC.

Section 58-37-10, S.C. Code Ann., (1976, as amended).

The South Carolina General Assembly has granted significant deference to this Commission in its evaluation of utility Integrated Resource Plans. Section 58-37-10 of the South Carolina Code of Laws states that, “For electrical utilities subject to the jurisdiction of the South Carolina Public Service Commission, this definition must be interpreted in a manner consistent with the integrated resource planning process adopted by the commission.”

Given the implications Duke Energy Carolinas, LLC's 2018 IRP will have on current and future proceedings in which the SCSBA has a vested interest, SCSBA respectfully requests that this Commission grant an opportunity for SCSBA to complete a thorough analysis of Duke Energy Carolina's IRP for submission to this Commission. SCSBA believes this analysis will materially aid in this Commission's review and consideration of Duke Energy Carolinas, LLC's 2018 IRP, or all other Dockets that rely on conclusions from Duke Energy Carolina's 2018 IRP to justify the prudence of Duke Energy Carolinas, LLC's proposals that directly impact the solar industry and ratepayers in South Carolina.

Given these considerations, the SCSBA respectfully requests that it be given until January 31st 2019, to submit SCSBA's analysis to this Commission.

Respectfully Submitted,
AUSTIN & ROGERS, P.A.

/s/Richard L. Whitt,
Richard L. Whitt,
As counsel for The South Carolina Solar
Business Alliance, Inc.

RLW/cas
cc: All Parties of Record, (via, electronic mail)